

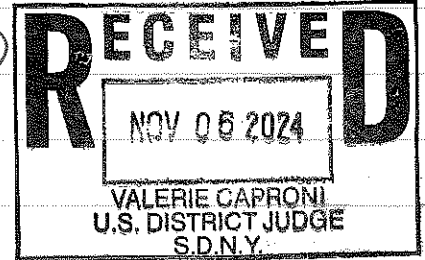
MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/6/2024

October 28, 2024
8:00 PM

Re: United States v. Reese,
24 Cr. 402 (VEC)

Dear Judge Caproni:



Since I have no way to correspond with my attorney, and I don't have his mailing address since it was removed from my possession, I am compelled to correspond with Your Honor for assistance.

At approximately 5:30 AM, I was awoken by federal officials banging on my cell door and shouting commands to turn on my cell lights and lay face-down on the cell floor. Completely startled and rattled, I complied. I then began experiencing shortness of breath and mild chest pain, but I was directed to remain motionless on the ground. After approximately twenty minutes, and having become visibly in distress I was directed to sit in a chair in my cell.

(2)

I was then allowed to use an inhaler that I am prescribed to treat my asthma, but denied an opportunity to administer Nitroglycerin - which is prescribed to treat angina - and to prevent a heart attack.

I also experienced an incontinent episode, and was denied access to the toilet for approximately ten minutes, despite the toilet being less than one foot from where I sat - soiled. After being allowed to discard the feces soiled padding in the toilet, I was denied an opportunity to cleanse myself, or an opportunity to flush the toilet.

I was subsequently removed (along with the unit population of more than 100 inmates) to another unit where we were denied access to toiletries or medication. I was also denied - for the second time in two days - my morning dose of insulin.

(3)

I was returned to my cell several hours later to find that legal material had been removed, along with medications, and the hard drive (discovery) provided to me on August 26, 2024. Also, the feces-soiled padding remained in the toilet and — despite the passage of more than twelve hours, ~~all~~ all inmates in my assigned unit have been denied access to running water to flush their toilets. I have been forced, despite my incontinence to remain in these inhumanely horrid conditions.

At 5:20 PM, I was, again, removed from my cell and taken to another floor by several federal officials and placed in a room with two individuals ~~who~~ who identified themselves as an FBI agent and OIG agent, and subjected to an interrogation regarding the discovery hard-drive. Part of that interrogation was recorded.

(4)

The hard drive has not been returned to me, and I am being denied any access to telephone or email and I cannot contact my attorney to seek his assistance.

In view of the foregoing, I am respectfully requesting immediate judicial intervention. The Court's indulgence in this matter will be greatly and most sincerely appreciated.

Respectfully Submitted,



CHRISTOPHER E. REESE

REG. NO. 17878-083

MDC Brooklyn

P.O. Box 329002

Brooklyn, New York 11232

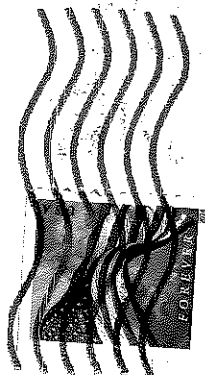
Christopher E. Reese
Reg. No. 17878-083
M.I.C. Brooklyn
P.O. Box 389003
Brooklyn, New York 11232

Legal Mail

The Honorable
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

NEW YORK NY 100
30 OCT 2024 PM 7 L

USM_{41D}
SDNY



The Court encourages Mr. Reese to discuss these issues with his lawyers, Mr. Margulis-Ohnuma and Ms. Cohen.

Mr. Margulis-Ohnuma's address is 353 Lexington Ave, Suite 900, New York, NY 10016. His telephone number is 212-685-0999. His email address is zach@zmolaw.com.

Ms. Cohen's address is 260 Madison Ave, 17th Floor, New York, NY 10016. Her telephone number is 212-685-0999. Her email address is tc@zmolaw.com.

The Clerk of the Court is respectfully directed to mail a copy of this order to Christopher E. Reese, Reg. No. 17878-083, M.D.C. Brooklyn, P.O. Box 329002, Brooklyn, NY 11232.

SO ORDERED.

 11/6/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE